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March 7, 2017

By ECF

Hon. Kenneth M. Karas United States District Court 300 Quarropas Street, Chambers 533 White Plains, New York 10601

Re: Fair Housing Justice Center, et al. v. Ulster Savings Bank,

16 Civ. 8608 (S.D.N.Y.) (KMK)

Your Honor:

This firm represents Plaintiffs in the above-referenced action. We write in advance of tomorrow's pre-motion conference, set for 10:30 a.m. In addition to seeking to move for dismissal, Defendant has also requested a stay of discovery. ECF No. 13. Plaintiffs of course oppose any such motion, ECF No. 16, and likewise oppose any stay of discovery while such a motion is being briefed.

In accordance with the mandate under the Federal Rules that the parties conduct a Rule 26(f) conference "as soon as practicable" and pursuant to a private agreement among the parties, we and counsel for Defendant have successfully conducted that conference, using Your Honor's standard form as a basis for creating a schedule. Accordingly, in the event that Your Honor denies Defendant's request for a stay at tomorrow's conference, we are prepared to present to the Court the parties' joint proposed discovery schedule for Your Honor's immediate review.

Very truly yours,

Mariann Meier Wang

Mariam Wang

cc (by ECF): Joe Dowdy, Esq.